

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ULYSSES LOPEZ,

VALENTINO LOPEZ,

CHRISTIAN LOPEZ,

FELIPE BARAJAS,  
a/k/a "Felipe Barajas  
Gallegos,"

JOSE OCEGUERA,  
a/k/a "Cande,"

FELIPE CORTES, and

SATURNINO OLIVEROS FARIAS,  
a/k/a "Genaro Robles,"

Defendants.

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SEALED INDICTMENT

18 Cr. 736

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 10/10/18

COUNT ONE

**(Narcotics Conspiracy)**

The Grand Jury charges:

1. From at least in or about April 2018 up to and including in or about October 2018, in the Southern District of New York and elsewhere, ULYSSES LOPEZ, VALENTINO LOPEZ, CHRISTIAN LOPEZ, FELIPE BARAJAS, a/k/a "Felipe Barajas Gallegos," JOSE OCEGUERA, a/k/a "Cande," FELIPE CORTES, and SATURNINO OLIVEROS FARIAS, a/k/a "Genaro Robles," the defendants, and others known and unknown,

intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ULYSSES LOPEZ, VALENTINO LOPEZ, CHRISTIAN LOPEZ, FELIPE BARAJAS, a/k/a "Felipe Barajas Gallegos," JOSE OCEGUERA, a/k/a "Cande," FELIPE CORTES, and SATURNINO OLIVEROS FARIAS, a/k/a "Genaro Robles," the defendants, and others known and unknown, would and did distribute, and possess with the intent to distribute, controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that ULYSSES LOPEZ, VALENTINO LOPEZ, and CHRISTIAN LOPEZ, the defendants, and others known and unknown, conspired to distribute and to possess with the intent to distribute were: (i) five kilograms and more of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A), and (ii) 50 grams and more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

4. The controlled substance that FELIPE BARAJAS, a/k/a "Felipe Barajas Gallegos," JOSE OCEGUERA, a/k/a "Cande," FELIPE CORTES, and SATURNINO OLIVEROS FARIAS, a/k/a "Genaro Robles," the

defendants, and others known and unknown, conspired to distribute and to possess with the intent to distribute was five kilograms and more of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

OVERT ACTS

5. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York:

a. On or about July 13, 2018, CHRISTIAN LOPEZ, the defendant, placed a phone call to ULYSSES LOPEZ, the defendant, in New Rochelle, New York, to discuss selling narcotics to a customer on consignment;

b. On or about July 13, 2018, ULYSSES LOPEZ, the defendant, while in New Rochelle, New York, participated in a phone call with SATURNINO OLIVEROS FARIAS, a/k/a "Genaro Robles," the defendant, in which they discussed FARIAS making further narcotics purchases from ULYSSES;

c. On or about July 16, 2018, JOSE OCEGUERA, a/k/a "Cande," the defendant, participated in a phone call with ULYSSES, who was in New Rochelle, New York, in which they discussed OCEGUERA purchasing additional narcotics from ULYSSES;

d. On or about July 17, 2018, ULYSSES, while in New

Rochelle, New York, participated in a phone call with FELIPE CORTES, the defendant, in which they discussed CORTES purchasing three kilograms of cocaine from ULYSSES for two different customers; and

e. On or about July 18, 2018, ULYSSES, while in New Rochelle, New York, participated in a phone call with FELIPE BARAJAS, a/k/a "Felipe Barajas Gallegos," the defendant, in which they discussed BARAJAS brokering a narcotics transaction between ULYSSES and a third party;

f. On or about September 28, 2018, VALENTINO LOPEZ, the defendant, participated in a phone call with ULYSSES, who was in Irvington, New York, in which they discussed VALENTINO purchasing a kilogram of cocaine from a supplier.

(Title 21, United States Code, Section 846.)

**FORFEITURE ALLEGATION**

6. As a result of committing the offense alleged in Count One of this Indictment, ULYSSES LOPEZ, VALENTINO LOPEZ, CHRISTIAN LOPEZ, FELIPE BARAJAS, a/k/a "Felipe Barajas Gallegos," JOSE OCEGUERA, a/k/a "Cande," FELIPE CORTES, and SATURNINO OLIVEROS FARIAS, a/k/a "Genaro Robles," the defendants, shall forfeit to the United States, pursuant to Title 21, United States code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in

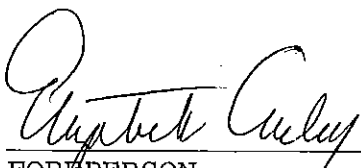
any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to 100-102 Union Avenue, New Rochelle, New York, 57 Walnut Street, New Rochelle, New York, and a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

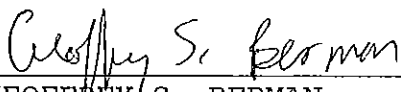
SUBSTITUTE ASSET PROVISION

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

  
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FOREPERSON

  
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GEOFFREY S. BERMAN  
Acting United States Attorney